LAW OFFICES OF

## Dukes, Dukes, Keating & Faneca, P.A.

GULFPORT, MISSISSIPPI 39501

WALTER W. DUKES HUGH D. KEATING CY FANECA PHILLIP W. JARRELL\* W. EDWARD HATTEN TRACE D.MCRANEY BOBBY R. LONG

JE'NELL B. GUSTAFSON\*\* DAVID N. DUHE HALEY N. BROOM AMANDA M. SCHWARTZ\*\*\* JON S. TINER

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2909 13™ STREET, SIXTH FLOOR

WILLIAM F. DUKES, (1927 - 2003)

P. O. DRAWER W **GULFPORT, MS 39502** 

TELEPHONE 228-868-1111

> FAX 228-863-2886

January 4, 2008

### VIA FACSIMILE AND U.S. MAIL

LaQuetta M. Golden, Esq. 12311 Ashley Drive, Suite D Gulfport, MS 39503

Re:

Michael Stephens v. Harrison County, Mississippi, et al.

U.S. District Court, Southern District of Mississippi, Southern Division

Civil Action No. 1:07cv96LG-JMR

Our File No. 1811.071

### Dear Laquetta:

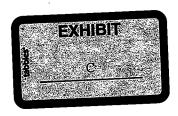
Our office has recently resent Defendant's Interrogatories and Requests for Production of Documents which were previously propounded to Plaintiff on October 15. 2007 and November 5, 2007. Defendant will allow your client until January 11, 2008 to complete and submit his responses to our office. If such responses are not received by that date, we will file a Motion to Compel with the Court.

Additionally, we would like to depose Plaintiff this month. Therefore, please provide dates that your client is available to be deposed at your office during the month of January.

Sincerely,

DUKES, DUKES, KEATING & FANECA, P.A.

HNB:Ih



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WILLIAM F. DUKES. (1927 - 2003)

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December 12, 2007

LaQuetta M. Golden, Esq. 12311 Ashley Drive, Suite D Gulfport, MS 39503

Re:

Michael Stephens v. Harrison County, Mississippi, et al.

U.S. District Court, Southern District of Mississippi, Southern Division

Civil Action No. 1:07cv96LG-JMR

Our File No. 1811.071

Dear Mrs. Golden:

Please reference our First Set of Interrogatories served on or about October 15, 2007 and Request for Production of Documents served on or about November 5, 2007. To date, we have not received your responses to this written discovery.

Please either provide Defendants with your responses within the next five (5) calendar days or sign the enclosed Good Faith Certificate on the line indicated, and return same to me in the stamped, self-addressed envelope. If I do not receive your discovery responses or the signed certificate from you within five (5) calendar days, I will proceed with a Motion to Compel and note that you refused to sign certificate.

Sincerely,

DUKES, DUKES, KEATING & FANECA, P.A.

Halev N. Broom

HNB:Ih **Enclosure**  FORM 5 (ND/SD Miss. DEC. 2000)

# **UNITED STATES DISTRICT COURT** SOUTHERN DISTRICT OF MISSISSIPPI

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v.

CIVIL ACTION

1:07cv96LGJMR

No.

HARRISON COUNTY, MISSISSIPPI; SHERIFF GEORGE H. PAYNE, JR.; AND UNKNOWN OFFICERS IN THEIR INDIVIDUAL AND OFFICIAL CAPACITY

#### **Defendants**

#### GOOD FAITH CERTIFICATE

All counsel certify that they have conferred in good faith to resolve the issues in question and that it is necessary to file the following motion:

Motion to Compel

Counsel further certify that:			
✓ as appropriate:			
1. The motion is unopposed by all parties.			
2. The motion is unopposed by:			

3. The motion is opposed by: Plaintiff

FORM 5 (ND/SD M	ISS. DEC. 2000)			
4. The parties agree that replies and rebuttals to the motion shall be submitted to the magistrate judge in accordance with the time limitations stated in Uniform Local Rule 7.2				
This the	day of	2007.		
		Signature of Plaintiff's Attorney		
		Typed Name and Bar Number		
		Signature of Defendant's Attorney		
		Cy Faneca, MSB # 5128		